

UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
)	
)	
v.)	No.: 21-CR-20-05-JL
)	
NOBODY)	
_____)	

MOTION FOR REVOCATION OF
DETENTION ORDER AND REQUEST FOR HEARING

NOW comes the defendant in the above entitled matter and, pursuant to 18 U.S.C. § 3145 (b), respectfully moves this Honorable Court to revoke its Order of detention on which he is being held and release him with conditions. Mr. Nobody requests a hearing on this matter pursuant to 18 U.S.C. § 3145(b), which requires that such motions be determined promptly.

As grounds therefore, it is stated that:

1. The defendant hereby incorporates by reference the entirety of the previously filed Motion for Release with Conditions and its Exhibits which were filed by counsel with this court on or about May 25, 2021,
2. The defendant further states that he has been recently prescribed medication at the Merrimack County jail to treat anxiety.
3. Such additional information further indicates how Mr. Nobody's volatile comments made after coming out of solitary, quarantine confinement were the product of anxiety, rather than malicious, feelings.
4. This motion is not assented to by the government.
- 5.. No legal memorandum accompanies this motion as the relief requested is fully set out in this, and the original, motion.

WHEREFORE, the Defendant requests this Court:

- A. Set this matter for a hearing;

- B. Revoke this Honorable Court's Order of Detention of June 1, 2021;
- C. Set appropriate conditions for his release; and
- D. Such other relief as the Court deems just and equitable.

Respectfully submitted,
NOBODY
By his attorneys

/s/ Patrick J. Richard

Dated: 6/10/21

PATRICK J. RICHARD
11 Kearney Square, Suite 202
Lowell, MA 01852
978-458-4279

/s/ *Christopher H. Brown*

CHRISTOPHER H. BROWN
Brown, Suarez, Rios & Weinberg, P.A.
1532 Jackson Street
Fort Myers, FL 33901
239-337-9755
239-337-9756 (fax)

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of June 2021 served the foregoing motion by ECF delivery upon all registered participants as identified on the Notice of Electronic Filing.

/s/ Patrick J. Richard

Patrick J. Richard, Esq.